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Subject Comments to ENERGY STAR Top Tier: Proposed Recognition Criteria

Please see the collective comments below from SHC Home Appliances, Kenmore Brand, and Consumer Electronics regarding the latest draft.

- 1. Has the EPA collaborated with CEE on the recognition criteria?
- 2. How will the performance expectations be upheld as product innovation transitions occur?
- 3. How will the 12 month calendar cycle for this designation align with new product introduction during the year?
- 4. What is the lead time for new product eligibility requests? Different for mid year vs. end of year?
- 5. Do you expect to modify the recognition criteria annually?
- 6. Do you anticipate manufacturer's imposing short term running changes to current production in order to meet recognition criteria (thus potentially increasing total eligible products in each category)?
- 7. There is concern about sales associates being able to meaningfully differentiate the two designations of E*, and if the EPA is intending to provide field support during the on-boarding period.

Thank you.

Paul Campbell Director-Green Leadership Home Appliances Sears Holdings Corp.